

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.

Rulemaking 12-03-014
(Filed March 22, 2012)

**DECISION AWARDING COMPENSATION TO THE VOTE SOLAR INITIATIVE
FOR CONTRIBUTION TO DECISION 14-03-004**

Claimant: The Vote Solar Initiative (Vote Solar)	For contribution to Decision (D.) 14-03-004
Claimed: \$141,173.72	Awarded: \$120,231.72 (14.83% reduction)
Assigned Commissioner: Michel Peter Florio	Assigned ALJ: David M. Gamson

PART I: PROCEDURAL ISSUES

A. Brief Description of Decision:	<p>In Track 4 of this proceeding, the Commission considered the need for additional local capacity requirements in SDG&E's territory and the LA Basin portion of SCE's territory in response to the closure of San Onofre Nuclear Generation Station, Units 2 and 3 (SONGS). In this Track 4 decision, the Commission authorized SCE to procure between 500 and 700 of additional MWs and SDG&E to procure between 500 and 800 of additional MWs.</p> <p>Combined with its decision in Track 1 of this proceeding, SCE is authorized to procure between 1,900 and 2,500 MW in the LA Basin, of which 40% to 60% is to be from preferred resources. SDG&E must procure between 25% to 100% of new local capacity from preferred resources.</p>
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B. Claimant must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Claimant	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	April 18, 2012	Yes.
2. Other Specified Date for NOI:		
3. Date NOI Filed:	May 16, 2012	Yes.
4. Was the NOI timely filed?		Yes, Vote Solar timely filed the Notice of Intent to claim compensation.
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.13-12-010	Yes.
6. Date of ALJ ruling:	April 21, 2014	Yes.
7. Based on another CPUC determination	D.13-07-046	Yes.
8. Has the Claimant demonstrated customer or customer-related status?		Yes, Vote Solar demonstrated customer-related status.
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding	R.13-12-010	Yes.
10. Date of ALJ ruling:	April 21, 2014	Yes.
11. Based on another CPUC determination	D.13-07-046	Yes.
12. Has the Claimant demonstrated significant financial hardship?		Yes, Vote Solar demonstrated significant financial hardship.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.14-03-004	Yes.
14. Date of Issuance of Final Order or Decision:	March 14, 2014	Yes.
15. File date of compensation request:	May 12, 2014	Yes.
16. Was the request for compensation timely?		Yes, Vote Solar timely filed the request for compensation.

PART II: SUBSTANTIAL CONTRIBUTION**A. Description of Claimant's contribution to the final decision (see § 1802(i), § 1803(a) & D.98-04-059).**

Intervenor's Claimed Contribution	Specific References to Claimant's Presentations and to Decision	Showing Accepted by CPUC
<p>1. Vote Solar recommended that SCE first should try to satisfy the LCR procurement authorized by the Commission, beyond the 1,000 – 1,200 MWs of gas fired generation authorized in D.13-02-015, with preferred resources and storage. Based on the SCE's request for a maximum authorization of 2,300 MWs of Local Capacity Resources (LCRs), Vote Solar's recommendations were for between approximately 48 – 57% to be procured from preferred resources or energy storage (or 52% - 60% using the 2,500 MW maximum authorized in D.14-03-004)</p>	<p>Exh. VSI-1 (Tr.4 Testimony of Jim Baak on behalf of the Vote Solar Initiative), pp.2-4</p> <p>D.14-03-004, pdf, p.95: "If SCE procures the maximum 2,500 MW of total resources, between 40% and 60% will be from preferred resources or energy storage."</p>	<p>Yes.</p>
<p>2. Vote Solar noted, with concern, that under SCE's track 4 procurement proposal, it was possible SCE could procure as much as 1,700 MWs of gas-fired generation from the 1,200 MW authorized in D.13-02-015 plus 500 MWs requested in track 4.</p> <p>Vote Solar argued this was excessive, "runs counter to policies intended to increase the use of Preferred Resources," and the Commission should ensure that</p>	<p>Vote Solar Opening Brief, dated Nov. 25, 2013, p.3</p> <p>D.14-03-004, pdf, pp.92-93: "Under SCE's approach, SCE could procure as much as 1,700 MW from gas-fired generation: 1,200 MW per Ordering Paragraph 1a in D.13-02-015 plus 500 MW from this decision. . . . It is not clear what would actually occur; under its proposal, SCE would control the procurement process consistent with its Track 1 procurement plan. . . . We will modify SCE's proposal to ensure that SCE procures a higher percentage of</p>	<p>Yes.</p>

more preferred resources and storage are procured.	authorized resources from preferred resources and energy storage. . . . This means that all incremental procurement as a result of this decision may be from preferred resources.”	
3. “Vote Solar is not inflexible in its support of a Preferred Resources strategy. Rather, Vote Solar believes that without the Commission’s insistence that the utilities first try to procure Preferred Resources, it is unlikely the utilities will do so.”	<p>Vote Solar Opening Brief, dated Nov. 25, 2013, pp.7-8</p> <p>D.14-03-004, pdf, pp.92-94: “Assuming SCE pursues a least-cost/best-fit approach to the increased discretionary portion of procurement authority (the additional 500 – 700 MW), it is likely that SCE would procure mostly gas-fired resources if such resources are less costly than preferred resources. From a ratepayer perspective, this may be beneficial; however, the Loading Order calls for prioritization of cost-effective preferred resources, in some cases even if they are more expensive than other resources. We will modify SCE’s proposal to ensure that SCE procures a higher percentage of authorized resources from preferred resources and energy storage. For SCE (and SDG&E as delineated below), we will not require any specific incremental procurement from gas-fired resources. This means that all incremental procurement as a result of this decision may be from preferred resources.</p> <p>D.14-03-004, pdf, p.96: “[A]s with SCE, it is our intent that SDG&E should also pursue significant percentages of procurement to replace SONGS through preferred resources, energy storage and consistency with the Loading Order.”</p>	Yes.
4. “Vote Solar is not inflexible in its support of a Preferred Resources strategy. . . . Vote	Vote Solar Opening Brief , dated Nov. 25, 2013, pp.7-8	Yes.

<p>Solar recognizes that if the utilities are not able to completely fill their LCR needs with Preferred Resources in the necessary timeframe, they should be allowed to fill their remaining need with the cleanest GFG available . . .”</p>	<p>D.14-03-004, pdf, pp.90-91: “While we strongly intend to continue pursuing preferred resources to the greatest extent possible, we must always ensure that grid operations are not potentially compromised by excessive reliance on intermittent resources and resources with uncertain ability to meet LCR needs.</p> <p>In the Commission’s RA proceeding (R.11-10-023), we are currently exploring the ability of various preferred resources and energy storage to meet LCR needs. The ISO is engaged in this effort as well. As this highly technical process develops, we will have a better idea of how such resources can be integrated with gas- fired resources to ensure reliability. In addition, we will learn more about the extent to which non-gas-fired resources can be used instead of gas-fired resources to meet LCR needs. Until this effort is better developed, we will take a prudent approach to reliability, while still promoting preferred resources to the greatest extent feasible. The prudent approach we take entails a gradual increase in the level of preferred resources and energy storage into the resource mix, to historically high levels.”</p>	
<p>5. “Vote Solar recognizes that if the utilities are not able to completely fill their LCR needs with Preferred Resources <i>in the necessary timeframe</i>, they should be allowed to fill their remaining need with the cleanest GFG available.”</p>	<p>Vote Solar Opening Brief, dated Nov. 25, 2013, pp.7-8 (emphasis added)</p> <p>D.14-03-004, pdf, pp.109-111: “D.13-02-015 at 3 - 4 noted that that decision was a first step in a longer procurement process related to the retirement of OTC plants and other factors: “We consider today’s decision a measured first step in a longer process. If as much or more of the preferred resources we expect do materialize, there will be no need for further LCR procurement based on</p>	<p>Yes.</p>

	<p>current assumptions. If circumstances change, there may be a need for further LCR procurement in the next long-term procurement proceeding.”</p> <p><i>There is a need for expeditious action to procure further resources in response to the retirement of SONGS.”</i> (emphasis added)</p>	
<p>6. “Vote Solar recommends that the Commission tell the utilities now that it will not authorize contingent site preparation or energy park development proposals for the purpose of backstopping LTPP procurement authorizations.”</p>	<p>Vote Solar Opening Brief, dated Nov. 25, 2013, p.10</p> <p>D.14-03-004, pdf, p.65, fn.148: “we do not opine on potential contingent site development plans at this time.”</p>	Yes.
<p>7. “Although Vote Solar recognizes there may be some value in SCE’s request for permission to enter into GFG contingency contracts as backup for GFG and Preferred Resources authorized in Tracks 1 and 4, Vote Solar does not find similar value or need for contingent site preparation proposals. SCE’s proposal to sign PPAs with GFG developers that contain opt-out clauses appear to be more reasonable and simpler to implement than the utilities’ contingent site preparation proposals, provided the option payment is not exorbitant.”</p>	<p>Vote Solar Opening Brief, dated Nov. 25, 2013, p.9</p> <p>D.14-03-004, pdf, pp.104-105: “Vote Solar recognizes there may be some value in SCE’s request for permission to enter into gas-fired generation contingency contracts as backup for resources authorized in Tracks 1 and 4. Vote Solar contends SCE’s proposal to sign PPAs with gas-fired generation developers that contain opt-out clauses appear to be more reasonable and simpler to implement than the utilities’ contingent site preparation proposals, provided the option payment is not exorbitant. . . . We need not make a determination on the merits of SCE’s contingency contract proposal here, as SCE is not seeking any specific approval. We do see potential value in such an approach, because there are many unknowns regarding future supply and demand in the LA Basin; contingency contracts may (if appropriately priced, effectively managed and well-located) reduce/mitigate disruptions and uncertainties in the future.</p>	Yes.

<p>8. “I generally support SCE’s recommendation for the Preferred Resources option to fulfill the LCR need from Track 1, including development of the proposed Mesa Loop-In transmission upgrades. The proposed transmission upgrades reduce the in-basin need . . . though they do not eliminate the need for replacement generation outside the basin. . . . I agree with SCE that the proposed transmission upgrades will significantly enhance reliability and provide more flexibility for the in-basin part of SCE’s grid.”</p> <p>“I am not providing an opinion on the need for the Pio Pico facility in this testimony. However, should the Commission disallow development of this facility, he 300 MW that was to be provided by Pio Pico should be included in the proposed Preferred Resources authorization.”</p>	<p>Exh. VSI-1 (Tr.4 Testimony of Jim Baak on behalf of the Vote Solar Initiative), p.3</p> <p>Exh. VSI-1 (Tr.4 Testimony of Jim Baak on behalf of the Vote Solar Initiative), p.9, fn.3</p> <p>D.14-03-004, pdf, pp.52-53: “We find that there is a reasonable possibility that at least one of the transmission solutions examined by SCE and SDG&E will be operational by 2022. The least complex of these projects is the Mesa-Loop-In project, which is therefore the most likely to meet this timeframe.</p> <p>We find based on the record the proposed transmission solutions in the record would most likely lower LCR needs, if completed in the appropriate timeframe. While the LCR effect of such potential transmission solutions has been quantified, we conclude that it is reasonable to consider this potential as a directional indicator rather than a reduction to the LCR needs identified by the ISO. Therefore, potential transmission solutions give us more</p>	<p>Yes.</p>
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	<p>confidence that it is not necessary at this time to authorize the utilities to procure all of the resources indicated to be necessary in the ISO's study.</p> <p>D.14-03-004, pdf, p.98: "SDG&E may procure from 25%to 100% of additional resources authorized by this decision from preferred resources or energy storage. We provide this wider range of possibilities for SDG&E, as compared to SCE, because SDG&E is already approved to procure about 300 MW from gas-fired generation (Pio Pico)."</p>	
<p>9. "My testimony recommends . . . expanding SCE's proposed Living Pilot to include advanced inverters as a means of supplying voltage control, establishing procurement mechanisms to allow phased deployment of greater quantities of distributed PV, and using distributed PV in combination with energy efficiency, automated demand response and energy storage to meet LCR needs in the LA Basin and San Diego, and providing incentives for PV system owners to orient their arrays to the west to maximize late afternoon energy production."</p> <p>"For large commercial applications, SCE could . . . target[] large commercial facilities on the circuits identified by SCE and CAISO as having the greatest LCR or voltage support needs. . . . Rather than serving facility load, one option is for the large</p>	<p>Exh. VSI-1 (Tr.4 Testimony of Jim Baak on behalf of the Vote Solar Initiative), p.1</p> <p>Exh. VSI-1 (Tr.4 Testimony of Jim Baak on behalf of the Vote Solar Initiative), pp. 6-7</p> <p>D.14-03-004, pdf, pp.70-73: "We have identified a number of resources, at least some of which are reasonably likely to be procured in the SONGS study area</p>	Yes.

<p>commercial program be designed so that the PV system supplies energy and reactive power directly to the grid rather than supplying energy for the customers' loads. This would greatly simplify the metering and monitoring requirements for energy consumed to provide reactive power for voltage support as well as actual watts and VARs produced."</p>	<p>by 2022 outside of this procurement proceeding. These include . . . demand response, energy efficiency, solar PV and energy storage resources. In addition, while it is speculative to consider the impacts of resources such as reactive power support, if such resources are available and effective at the right place and in a timely manner, they would have the impact of lowering LCR needs. Further, the future Living Pilot may add additional resources. We find that it is unreasonable to assume that none of these resources will be procured and able to meet local reliability needs in the SONGS service area by 2022."</p>	
<p>10. "SCE's proposed Living Pilot would provide valuable data on the ability of Preferred Resources to meet LCR needs and could be used to develop best practices for implementing Preferred Resources and energy storage technologies. The Living Pilot should be expanded to include testing of advanced inverters for PV to demonstrate the voltage and frequency support capabilities this technology offers. Voltage support is an issue CAISO, SCE and SDG&E all indicated was a serious concern post-SONGS, and advanced inverters strategically located throughout the distribution grid could provide voltage support at critical areas within the distribution grid. Including advanced inverters in the pilot, coincident with deployment of smart grid capabilities, could help spur deployment of this technology while penetration</p>	<p>Exh. VSI-1 (Tr.4 Testimony of Jim Baak on behalf of the Vote Solar Initiative), pp.4-5</p>	<p>Yes.</p>

<p>levels of distributed PV are still relatively low, potentially increasing the value of distributed PV for reliable grid operation.”</p> <p>“Vote Solar urges the Commission direct SCE and SDG&E to submit applications to institute Preferred Resources Pilots.”</p> <p>“Vote Solar supports the purpose and need for Living Pilot programs and views them as a means of leveraging market-driven and incentive-driven Preferred Resources, including rooftop solar, smart inverters and energy storage, to the maximum benefit of the grid, consumers and potential market participants.</p> <p>SDG&E should also develop a pilot program similar to SCE’s Living Pilot proposal to monitor and evaluate the ability of Preferred Resources to meet LCR needs.</p>	<p>Vote Solar Opening Brief, dated Nov. 25, 2013, p.9</p> <p>Vote Solar Opening Comments on the PD, dated March 3, 2014, p.9</p> <p>Exh. VSI-1 (Tr.4 Testimony of Jim Baak on behalf of the Vote Solar Initiative), p.10 D.14-03-004, pdf, pp.65-66: “The purpose of the Living Pilot is to aggressively pursue energy efficiency, demand response and distributed generation resources in this high impact area. SCE intends to use the Pilot to demonstrate the value that preferred resources can contribute to meeting LCR needs. . . [T]he Living Pilot is promising both as a way to meet LCR needs and as a laboratory for innovation regarding preferred resources. We intend to take a close look at the Living Pilot when SCE files its application. For now, we simply note that projects which may become part of the Living Pilot may have the potential to reduce</p>	
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	<p>the need for other resources to meet LCR needs in the LA Basin. In addition, we strongly encourage SDG&E to pursue its own Living Pilot, or a tailored version of it. . . SDG&E should consider this decision as the Commission's request."</p>	
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B. Duplication of Effort (§§ 1801.3(f) & 1802.5):

	Claimant	CPUC Verified
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding? ¹	Yes	Yes.
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Yes.
c. If so, provide name of other parties: Vote Solar was the only party primarily focused on solar photovoltaic (PV) issues, in particular, the use of solar PV to satisfy preferred resources requirements and the need for research and development of smart inverters as part of the Living Pilot proposals. However, Vote Solar also generally supported the use of preferred resources and energy storage to satisfy local capacity resource needs, which in varying forms of support, was also addressed by other parties, which included CEERT, Sierra Club, Clean Coalition, NRDC and CEJA		Verified.
d. Intervenor's claim of non-duplication: During the course of this proceeding, Vote Solar had meetings and conference calls with various combinations of the following parties, for the purpose of discussing joint issues and litigation strategies, coordinating cross-examination of witnesses and avoiding duplication of issues: DRA, TURN, CEERT, Sierra Club, Clean Coalition, NRDC and CEJA. In particular, Vote Solar significantly reduced its originally anticipated cross-examination of witnesses as a result of these meetings.		Verified. As discussed by Vote Solar, numerous groups, including Vote Solar, TURN, CEERT, Sierra Club, Clean Coalition, NRDC, CEJA, and others presented information that was duplicative. While the Commission appreciates Vote Solar's reduction

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

	<p>in cross-examination, Vote Solar (and other intervenors) did not adequately coordinate and reduce the hours claimed for the presenting of issues A, B, C, and D, listed below.</p> <p>After review of the submissions and records of the intervenors, the Commission disallows 25% for those issues.</p>
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§§ 1801 & 1806):

<p>a. Intervenor’s claim of cost reasonableness</p> <p>Vote Solar’s participation in this proceeding was directed at policy and environmental matters, and therefore ascertaining direct benefits, in terms of actual dollars, to ratepayers is difficult. Nevertheless, Vote Solar’s actions as an individual party resulted in direct and specific ratepayer benefits in that the Commission determined, as Vote Solar asserted, that the utilities be required to satisfy their local capacity requirements with greater levels of preferred resources and storage than they proposed, in accordance with Loading Order requirements and to minimize GHG emissions issues.</p> <p>Therefore, Vote Solar’s participation is fully consistent with D.88-04-066, mimeo, p.3, which states:</p> <p>“With respect to environmental groups, [the Commission has] concluded they were eligible in the past with the understanding that they represent customers whose environmental interests include the concern that, e.g., regulatory policies encourage the adoption of all cost-effective conservation measures and discourage unnecessary new generating resources that are expensive and environmentally damaging. They represent customers who have a concern for the environment which distinguishes their interests from the interests represented by Commission staff, for example.” mimeo, p.3</p> <p>Ultimately, ratepayers have directly benefitted by the above</p>	<p><u>CPUC Verified</u></p> <p>Verified.</p>
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described advocacy by Vote Solar and its focus on environmental concerns and developing the full potential of solar and other preferred resources.	
<p>b. Reasonableness of Hours Claimed.</p> <p>Vote Solar is a small, tightly staffed and budgeted organization with a very “flat” management structure. Vote Solar continuously strives, whenever practical or possible, to narrow participation to areas where Vote Solar is more likely to bring a unique voice, perspective or contribution.</p> <p>At the time R.12-03-014 began, Kelly Foley was handling this matter as Vote Solar’s only in house attorney and the only employee, attorney or otherwise, dedicated full time to CPUC-related issues. After Ms. Foley’s departure from Vote Solar to become CEC Commissioner David Hochschild’s advisor, Vote Solar no longer had any in house legal counsel and so retained the law firm of Ellison, Schneider & Harris (ESH), located in Sacramento, California, to provide the specialized expertise needed for the representation of Vote Solar’s interests in track 4 of this proceeding.</p> <p>As the time sheets indicate, ESH attorney Ronald Liebert assisted Vote Solar on all aspects of track 4. Vote Solar is seeking intervenor compensation only for Mr. Liebert. (<i>Vote Solar is not seeking reimbursement for any of Ms. Foley’s time spent on this proceeding</i>). Mr. Liebert has extensive experience representing customer groups and interest groups at the CPUC and the cumulative hours Mr. Liebert spent on this matter, including hearings, briefs and comments were reasonable and necessary.</p> <p>Vote Solar also seeks intervenor compensation for its Program Director, Jim Baak, who was Vote Solar’s expert witness in this track 4 proceeding. Using Mr. Baak as Vote Solar’s expert witness was less expensive than retaining an outside expert witness both in time billed and rate charged. Therefore, Mr. Baak’s time spend on this matter also was reasonable and necessary.</p> <p>Finally, although ESH’s office is located in Sacramento, approximately 90 miles from the Commission, as per the intervenor compensation rules, Vote Solar is not requesting any travel time or travel expenses for Mr. Liebert to attend proceedings at the Commission.</p>	<p>Verified, <i>but see</i> CPUC Disallowances and Reductions, Part.III.C.</p>
<p>c. Allocation of Hours by Issue – see Attachment 2 for details.</p> <p>Issue A. Whether the utilities should first try to satisfy any</p>	<p>Verified. <i>See also</i> Part II.D.b, above, explaining that</p>

<p>additional local capacity resources authorized by the Commission, beyond the 1,000 – 1,200 MWs of gas fired generation authorized in D.13-02-015, with preferred resources and storage before seeking additional gas-fired generation resources: 112.20 hours (27.53%)</p> <p>Issue B. Whether SCE should be allowed to procure a maximum 1,700 MW from gas-fired generation: 57.95 hours (14.22%)</p> <p>Issue C. Whether the utilities should be allowed to pursue contingent site preparation or energy park development proposals for the purpose of backstopping LTPP procurement authorizations: 16.55 hours (4.06%)</p> <p>Issue D. Whether there is any value in SCE’s request for permission to enter into gas-fired generation contingency contracts as backup for resources authorized in Tracks 1 and 4: 21.30 hours (5.23%)</p> <p>Issue E. Whether proposed transmission solutions can lower local capacity resource needs: 28.40 hours (6.97%)</p> <p>Issue F. Whether demand response, energy efficiency, solar PV and energy storage resources, and their ability other benefits, such as reactive power support, can reduce local capacity resource needs: 33.45 hours (8.21%)</p> <p>Issue G. Whether SCE’s proposed Living Pilot would provide valuable data on the ability of preferred resources to meet local capacity resource needs and whether SDG&E should pursue a Living Pilot program as well: 39.70 hours (9.74%)</p> <p>Issue H. General and Procedural: 98.05 hours (24.06%)</p>	<p>Vote Solar will be awarded 75% of the hours claimed relating to issues A, B, C, and D, due to duplication between intervenors.</p>
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B. Specific Claim:

CLAIM						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for	Total \$	Hours	Rate \$	Total \$

Attorney: Ronald Liebert (RL)	2013	189.3	\$395	Pending First-time representative rate request for 2012 and 2013, submitted in R.11-10-023, dated August	74,773.50	162.85 [1]	395.00 [2]	64,325.75
Attorney: Ronald Liebert (RL)	2014	65.7	\$420	See Comment 1, in Section C., below	27,594	55.9 [3]	405.00 [4]	22,639.50
Expert: Jim Baak (JB)	2013	97.1	\$275	First-time representative – rate request rationale provided in Attachment 3	26,702.50	86.35 [5]	275.00 [6]	23,746.25
Expert: Jim Baak (JB)	2014	18.45	\$275	First-time representative – rate request rationale provided in Attachment 3	5,073.75	16.20 [7]	\$280.00 [8]	4,536.00
Subtotal: \$134,143.75						Subtotal: 115,247.80		
OTHER FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate (\$)	Total \$
Eric L. Janssen (ELJ)	2013	4.7	\$100	First-time representative – rate request rationale provided in Attachment 4	470	4.7	100.00 [9]	470.00
Eric L. Janssen (ELJ)	2014	3.2	\$100	First-time representative – rate request rationale provided in Attachment 4	320	3.2	105.00 [10]	336.00
Subtotal: \$790						Subtotal: \$806.00		

INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hour	Rate	Total \$
Ronald Liebert	2014	23.4	\$210	½ of requested 2014 rate	4,914	14.00 [11]	202.50	2,835.00
Jim Baak (JB)	2014	5.75	\$137	½ of requested 2014 rate	787.75	5.75	140.00	805.00
Subtotal: \$5,701.75						Subtotal: \$3,640.00		
COSTS								
#	Item	Detail			Amount	Amount		
	Expenses	Total - Photocopies, postage, Federal Express (details attached to end of timesheets in Attachment 2)			\$538.22	\$538.22 [12]		
TOTAL REQUEST: \$141,173.72					TOTAL AWARD: \$120,231.72			
<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer’s normal hourly rate</p>								
Attorney		Date Admitted to CA BAR ²			Member Number		Actions Affecting Eligibility	
Ronald Liebert		December 11, 1989			142964		No	

C. CPUC Disallowances and Adjustments:

Item	Reason
[1]	In 2013, Liebert claims 105.8 hours spent on Issues A, B, C, and D. As discussed above, Vote Solar's award we disallow 25% of Vote Solar's award the claimed hours in these areas. 26.45 hours are removed from Liebert's 2013 total.
[2]	Based on experience and training, the Commission approves Liebert's 2013 rate of \$395.
[3]	In 2014, Liebert claims 39.2 hours spent on Issues A, B, C, and D. As discussed above, Vote Solar's award we disallow 25% of Vote Solar's award the claimed hours in these areas. 9.8 hours are removed from Liebert's 2013 total.

² This information may be obtained at: <http://www.calbar.ca.gov/>.

[4]	The Commission applied the 2014 cost-of-living adjustment found in Resolution ALJ-303, of 2.58%, to Liebert's 2013 rate in order to obtain the appropriate 2014 rate. After rounding to the nearest five-dollar increment, this resulted in a 2014 rate of \$405, which the Commission now approves.
[5]	In 2013, Baak claims 43 hours spent on Issues A, B, C, and D. As discussed above, Vote Solar's award will be reduced by 25% for the claimed hours in these areas. 10.75 hours are removed from Baak's 2013 total.
[6]	Based on experience and training, the Commission approves Baak's 2013 rate of \$275.
[7]	Baak's timesheet lists 1.25 hours spent in an <i>ex parte</i> meeting with the Commission. Per the Notice of Ex Parte Communication filed with the Commission on January 28, 2014, this meeting lasted 1 hour. As such, 0.25 hours have been deducted from Baak's 2014 compensation. In addition, Baak spent 9 hours on Issues A, B, C, and D in 2014. As discussed above, Vote Solar's award will be reduced by 25% for the claimed hours in these areas. 2.25 hours are removed from Baak's 2014 total.
[8]	The Commission applied the 2014 cost-of-living adjustment found in Resolution ALJ-303, of 2.58%, to Baak's 2013 rate in order to obtain the appropriate 2014 rate. After rounding to the nearest five-dollar increment, this resulted in a 2014 rate of \$280, which the Commission now approves.
[9]	Based on experience and training, the Commission approves Janssen's 2013 rate of \$100.
[10]	The Commission applied the 2014 cost-of-living adjustment found in Resolution ALJ-303, of 2.58%, to Janssen's 2013 rate in order to obtain the appropriate 2014 rate. After rounding to the nearest five-dollar increment, this resulted in a 2014 rate of \$105, which the Commission now approves.
[11]	The Commission notes that Vote Solar spent an excessive amount of time preparing intervenor compensation materials. As such, the claim has been reduced to a reasonable amount of hours.
[12]	Future Vote Solar claims must provide more detail on the cost and documents that require photocopying and Vote Solar must seek a waiver of transcript fees in future proceedings, in which it is found eligible.

PART IV: OPPOSITIONS AND COMMENTS

Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (*see* § 1804(c))

A. Opposition: Did any party oppose the Claim?	No.
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(C)(6))?	Yes.

FINDINGS OF FACT

1. The Vote Solar Initiative has made a substantial contribution to D.14-03-004.
2. The requested hourly rates for The Vote Solar Initiative's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$120,231.72.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. The Vote Solar Initiative is awarded \$120,231.72.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric, and Southern California Edison Company shall pay The Vote Solar Initiative their respective shares of the award, based on their California-jurisdictional electric revenues for the 2013 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning July 26, 2014, the 75th day after the filing of Claimant's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.

This decision is effective today.

Dated _____, 2015, at San Francisco, California.

APPENDIX
Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D1403004		
Proceeding(s):	R1203014		
Author:	ALJ Gamson		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric, and Southern California Edison Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Vote Solar Initiative	5/12/2014	\$141,173.72	\$120,231.72	N/A	See Part III.C. above.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Eric	Janssen	Paralegal	Vote Solar Initiative	\$100	2013	\$100.00
Eric	Janssen	Paralegal	Vote Solar Initiative	\$100	2014	\$105.00
Jim	Baak	Expert	Vote Solar Initiative	\$275	2013	\$275.00
Jim	Baak	Expert	Vote Solar Initiative	\$275	2014	\$280.00
Ronald	Liebert	Attorney	Vote Solar Initiative	\$395	2013	\$395.00
Ronald	Liebert	Attorney	Vote Solar Initiative	\$420	2014	\$405.00

(END OF APPENDIX)